

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

RITA HUANG

Criminal No. 2:25-cr-31

INFORMATION MEMORANDUM

AND NOW comes the United States of America, by its attorneys, Troy Rivetti, Acting United States Attorney for the Western District of Pennsylvania, and Jeffrey R. Bengel, Assistant United States Attorney for said District, and submits this Information Memorandum to the Court:

I. THE INFORMATION

A one-count Information was filed against the above-named defendant for an alleged violation of federal law:

<u>COUNT</u>	<u>OFFENSE/DATE</u>	<u>TITLE/SECTION</u>
One	Conspiracy to Commit Money Laundering October 2020 to May 2023	18 U.S.C. § 1956(h)

II. ELEMENTS OF THE OFFENSE

A. As to Count One:

In order for the crime of Conspiracy to Commit Money Laundering, in violation of 18 U.S.C. § 1956(h), to be established, the government must prove all of the following essential elements beyond a reasonable doubt:

1. That a conspiracy to launder money, as charged in the Information, was entered into by two or more people;

2. That the defendant knew the purpose of the conspiracy; and
3. That the defendant deliberately joined the conspiracy.

United States v. Navarro, 145 F.3d 580, 593 (3d Cir. 1998); 18 U.S.C. § 1956(h); Whitfield v. United States, 543 U.S. 209 (2005) (“[C]onviction for conspiracy to commit money laundering, in violation of 18 U.S.C. § 1956(h), does not require proof of an overt act in furtherance of the conspiracy”).

III. PENALTIES

A. As to Count One: Conspiracy to Commit Money Laundering (18 U.S.C. § 1956(h)):

1. A term of imprisonment of not more than twenty (20) years;
2. A fine of not more than \$500,000 or twice the value of the property involved in the transaction, whichever is greater;
3. A term of supervised release of not more than three (3) years;
4. Any or all of the above.

IV. MANDATORY SPECIAL ASSESSMENT

A mandatory special assessment of \$100.00 must be imposed at each count upon which a defendant is convicted, pursuant to 18 U.S.C. § 3013.

V. RESTITUTION

Restitution may be required in this case as to Count One, together with any authorized penalty, as part of the defendant's sentence pursuant to 18 U.S.C. §§ 3663A and 3664.

VI. FORFEITURE

Forfeiture is not applicable in this case.

Respectfully submitted,

TROY RIVETTI
Acting United States Attorney

/s/ Jeffrey R. Bengel
JEFFREY R. BENGEL
Assistant U.S. Attorney
DC ID No. 1018621